

KIMBERLEE WILLIAMS, et al.,

Plaintiffs,

vs.

BASF CATALYSTS LLC, et al.,

Defendants.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DOCKET NO. 11-cv-1754 (JLL) (JAD)
CIVIL ACTION

**NOTICE OF MOTION TO
DETERMINE THE APPLICABILITY
OF THE CRIME-FRAUD AND
KOZLOV EXCEPTIONS TO
DEFENDANTS' PRIVILEGE CLAIMS**

ELECTRONICALLY FILED

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PLEASE TAKE NOTICE that on a time and date to be determined by the Court, or as soon thereafter as counsel may be heard, the undersigned attorneys for Named Representative Plaintiffs and the Proposed Class (“Plaintiffs”), shall move before the Honorable Special Discovery Master Justice Roberto Rivera-Soto, Special Discovery Master, United States District Court, District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New

Jersey 07101, for an Order granting its Motion to Determine the Applicability of the Crime-Fraud and *Kozlov* Exceptions to Defendants' Privilege Claims.

PLEASE TAKE FURTHER NOTICE that in support of its motion, Plaintiffs will rely on its Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Date: November 2, 2017

Respectfully Submitted,

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